



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA

Randall Ephon #3452308  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Enter above the full name of the plaintiff  
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 3:18-cv-978  
(Number to be assigned by Court)

Sr. Tpr. A.T. Farmer;  
Western Regional Jail;  
Elbert Davis; (inmate)  
\_\_\_\_\_

(Enter above the full name of the defendant  
or defendants in this action)

**COMPLAINT**

**I. Previous Lawsuits**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes \_\_\_\_\_

No ✓

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs:

N/A

\_\_\_\_\_

\_\_\_\_\_

Defendants:

N/A

\_\_\_\_\_

\_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county);

N/A

3. Docket Number:

N/A

4. Name of judge to whom case was assigned:

N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit:

N/A

7. Approximate date of disposition:

N/A

II. Place of Present Confinement: Western Regional Jail

A. Is there a prisoner grievance procedure in this institution?

Yes ✓ No       

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ✓ No       

C. If your answer is YES:

1. What steps did you take? I filed a  
grievance on the situation.

2. What was the result? Rejection.

D. If your answer is NO, explain why not: W/A

### III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Randall Epton #3452308

Address: Western Regional Jail / Charleston pl. Barboursville, WV  
25304

B. Additional Plaintiff(s) and Address(es): \_\_\_\_\_

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

- C. Defendant: Sr. Tpr. A. T. Farmer  
 is employed as: State trooper  
 at West Virginia State police
- D. Additional defendants: Western Regional Jail  
1 Chardon pl. Barboursville, WV  
25504  
Elbert Davis - Inmate at Western Regional Jail

#### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 3/30/2018 I was charged with  
(2) Felony charges at the Western  
Regional Jail for 1.) Molestation,  
2.) Assault; Battery, Towards another Inmate.  
(Elbert Davis).

I notified the staff here at the  
Jail that I did NOT Enter the  
cell during the incident and that

**IV. Statement of Claim (continued):**

the (2) cameras on the unit at the Jail will prove that. These charges were later dropped (4/6/2018) due to my demand of a preliminary hearing. However, I was put on the news for these charges and was not removed. My character and reputation was harmed due to these false Allegations, as well as my family's.

**V. Relief**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I respectfully ask the court to be fully compensated due to the Damage inflicted towards my character concerning charges I was innocent of. I respectfully ask the courts to remove my name from the news or internet concerning these charges. Case # 18-MJGF-00290

V. Relief (continued)):

N/A  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

N/A  
\_\_\_\_\_

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes \_\_\_\_\_ No ✓

If so, state the name(s) and address(es) of each lawyer contacted:

\_\_\_\_\_  
\_\_\_\_\_

If not, state your reasons: Pro se plaintiff  
\_\_\_\_\_

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes \_\_\_\_\_ No ✓

If so, state the lawyer's name and address:

N/A  
\_\_\_\_\_  
\_\_\_\_\_

Signed this 27 day of May, 2018.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Remondell Espino  
Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 27<sup>th</sup> 2018  
(Date)

Remondell Espino  
Signature of Movant/Plaintiff

\_\_\_\_\_  
Signature of Attorney  
(if any)



Randall E. Olson  
Johnston P.  
Barboursville, WV  
25524

This person is an inmate  
at Western Regional Jail

Clark, United States District Court  
845 Fifth Avenue, Room 101  
Huntington, WV  
25701

